REMARKS

Applicant appreciates the careful consideration, examination, and favorable treatment of the claims in which claims 1,-21 and 24-27 are indicated as containing allowable subject matter upon entry of minor amendments to correct formal matters.

More specifically, claims 1-31 stand rejected under 35 U.S.C. 112, second paragraph, on the basis of the recitation of the term "effectively" in claims 1, 22 and 23 and the phrase "guided manner" in claims 9 and 25. Applicant has amended claims 1, 22 and 23 to eliminate the term "effectively" and has amended claims 9 and 25 to eliminate the expression "guided manner". Based on the above amendments, this ground of rejection should be withdrawn.

Claims 22, 23 and 28-34 stand rejected under 35 U.S.C. 102(b) as being anticipated by Belongia et al. Applicant respectfully traverses this rejection based on the following comments and the present amendments.

The Belongia reference generally discloses some details similar to those in the present invention, such as a rider roll 14 that is held in engagement with the roll 3 during the complete winding cycle; and a rider roll assembly 15 including a counterweighted force control unit 19 that includes a counterweight unit 20 and a force generator unit 21 coupled to the roll unit 13 for establishing a constant force on the roll 14 and therefore on the surface of the rewound roll 3 during the complete winding cycle.

However, there are significant differences between the "pack roll assembly" (force control unit 19) of the Belongia reference and the one of the present invention. In particular, the actual carrier mechanism is quite different and another key difference which has been presented in the amended claims is that the two pack roll assemblies of the present invention each are able to rotate about the winding core and more particularly, each pack roll assembly can rotate independently from the other pack role assembly. This is in complete contrast to the arrangement in the Belongia reference, where as is clearly shown in Figure 4 of Belongia, the weight balance and force control unit 19 is mounted to the turret support structure (see mounting plate 52 secured to the

turret end frame 10). Thus, the control unit 19 would not be able to rotate independently from the other control unit 19 since both are directly and fixedly mounted to the turret.

In view of the foregoing difference and to more clearly define the present device, Applicant has amended each of the independent claims 22, 23 and 32, to recite that each pack roll assembly includes the respective pack roll and a mechanism for moving and maintaining the pack roll in contact with the respective one core with the winding roll thereon being independently rotatable relative to the respective one core with the winding roll and relative to the other pack roll assembly.

Since the "pack roll assembly" of Belongia is not able to rotate independently from the other pack roll assembly as a result of both being directly and fixedly mounted to the turret, this newly added feature in each of independent claims 22, 23 and 32 is clearly not disclosed or contemplated by the Belongia device. Since at least one feature is lacking and is not suggested by the reference, the rejection of each of independent claims 22, 23 and 32 is improper and should be withdrawn. In fact, the opposite is true since Belongia teaches a rigid, fixed, non-rotatable arrangement for the "pack roll assembly".

Reconsideration and allowance of independent claims 22, 23 and 32 are earnestly solicited.

Claims 2-21 should be allowed as depending from what should be an allowed independent claim 1.

Claims 24-31 should be allowed as depending from what should be an allowed independent claim 23.

Claims 33-34 should be allowed as depending from what should be an allowed independent claim 32.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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